



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

July 16, 2007

Reply To  
Attn Of: ETPA-088

Ref: 06-075-AFS

John Hensley, Project Manager  
Department of Agriculture - U. S. Forest Service  
Malheur National Forest  
431 Patterson Bridge Road, P.O. Box 909  
John Day, OR 97845

Dear Mr. Hensley:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Thorn Fire Salvage Recovery Project** (CEQ No. 20070211) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The proposed action includes salvage of dead and dying trees on approximately 3,907 acres and the removal of potential danger trees for public safety for approximately 43.4 miles along haul routes and open forest travel routes. Salvage methods would include ground-based harvest on approximately 496 acres (13%) and helicopter harvest on approximately 3,411 acres (87%). The EIS identifies Alternative 2 as the proposed action and the preferred alternative.

We have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. Our concerns are that there would be long term recreational impacts and changes from a naturally appearing environment in some of the management areas under both of the proposed action alternatives. In addition, the document needs clarification or additional information to support the purpose and need for the proposed project. A copy of the rating system used in conducting our review is enclosed for your reference. Our concerns are highlighted below and discussed further in our enclosed detailed comments.

We appreciate the inclusion of silviculture activities that address a number of the potential environmental impacts from the proposed project. Of particular interest is the number of acres that will be harvested using helicopter logging, the maintenance of approximately 55 miles of forest roads and harvesting in areas with high potential for detrimental disturbance only when snow or frozen ground are present. You and your staff are to be commended for including these activities in the proposed project.

While the majority of project related effects to recreation resources are short-term in duration, there will be long-term displacement of recreational users for five seasons in some management areas due to salvage harvest activities. Activities in area MA 10, a semi-primitive non-motorized recreation area are of particular concern. The preferred alternative will not meet the recreation standard direction in areas MA 10, MA 20A and MA 21 for about five years and may result in changes from a naturally appearing environment to a modified setting, especially in areas of ground-based removal. While Alternative 3 does not allow for commercial salvage activities in area MA 10 and consequently would meet the recreation standard direction in this area, this alternative will not meet the recreation standard direction in areas MA 20A and MA 21 because of salvage logging activities in those areas. The EIS needs to clearly demonstrate that salvage harvest activities in areas MA 10, MA 20A and MA 21 are needed to meet the project objectives or evaluate an alternative that meets the recreation standard direction in all project areas.

The purpose and need for the proposed project includes three objectives. Objective #1 is to recover the economic value of fire-killed timber to maximize potential economic benefits. The EIS states that there is a need to make wood products available for local, regional, and national needs to provide jobs in the most cost-effective manner. To accomplish this objective ten Forest Plan amendments are proposed to allow recovery of the economic value of fire-killed timber. The document provides a discussion on the demographics of the area, the community's dependence on timber related jobs and an analysis on the cost and income the project will provide. However, the document states that the project will substitute green harvest volumes with salvage harvest, market conditions in the area are depressed and that local mills are already operating at full capacity for single shifts. While the project will provide some income with the proposed planting and reforestation activities in non-essential areas, the EIS concludes that that there would be no substantial increase in employment or labor income associated with the timber harvested under the proposed action. The information provided in the document does not clearly demonstrate that Objective #1 of the proposed project will be met. The document needs to clearly demonstrate that there is a need to recover the economic value of the fire-killed timber in the proposed project area.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact Mike Letourneau at (206) 553-6382.

Sincerely,

/s/

Christine Reichgott, Manager  
NEPA Review Unit

Enclosure